

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN REINSURANCE COMPANY,
et al.,

Plaintiff,

v.

AMERICAN INTERNATIONAL GROUP and
TRENWICK AMERICA REINSURANCE
CORPORATION,

Defendants.

Case No.: 05-11840-MLW

**MOTION FOR ADMISSION *PRO HAC VICE* FOR
RONALD S. RAUCHBERG, MARGARET A. DALE AND DAVID L. SHAUL
TO APPEAR ON BEHALF OF
DEFENDANT TRENWICK AMERICA REINSURANCE CORPORATION**

Pursuant to Local Rule 83.5.3(b), the undersigned counsel moves for the admission *pro hac vice* of Ronald S. Rauchberg, Margaret A. Dale, and David L. Shaul, of the law firm Proskauer Rose LLP, to appear on behalf of Defendant Trenwick America Reinsurance Corporation in the above-captioned case.

As set forth in the attached certifications, Attorneys Rauchberg, Dale, and Shaul are members in good standing in every jurisdiction where they have been admitted to practice; there are no disciplinary proceedings pending against them as members of the bar in any jurisdiction; and they are familiar with the Local Rules of the U.S. District Court of the District of Massachusetts.

The undersigned counsel is sending a check by first class mail to the Clerk of the Court in the amount of \$150.00 to cover the required filing fees for *pro hac vice* admission.

WHEREFORE, it is respectfully requested that Attorneys Rauchberg, Dale, and Shaul be admitted *pro hac vice* to appear on behalf of Defendant Trenwick America Reinsurance Corporation in the above-captioned case.

Dated: September 15, 2005

Respectfully submitted,

/s/ Eben A. Krim

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Eben A. Krim
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ATTORNEYS FOR DEFENDANT TRENWICK
AMERICA REINSURANCE CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all attorneys of record by first-class mail, postage prepaid, this 15th day of September, 2005.

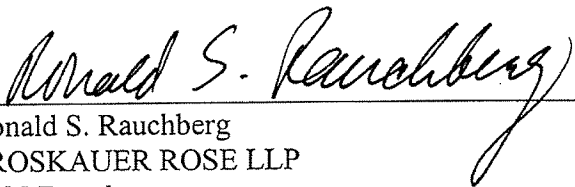
/s/ Eben A. Krim

Eben A. Krim

CERTIFICATION BY RONALD S. RAUCHBERG

Pursuant to Local Rule 83.5.3(b), I, Ronald S. Rauchberg, hereby certify that (1) I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice (New York State; U.S. Supreme Court, U.S. Court of Appeals for the Second Circuit, U.S. Court of Appeals for the Third Circuit, U.S. Court of Appeals for the Sixth Circuit, U.S. Court of Appeals for the Seventh Circuit, U.S. Court of Appeals for the Ninth Circuit, U.S. Court of Appeals for the Tenth Circuit, U.S. Court of Appeals for the Eleventh Circuit, U.S. Court of Appeals for the D.C. Circuit, U.S. Court of Appeals for the Federal Circuit, U.S. District Court for the Eastern District of New York; U.S. District Court for the Southern District of New York, U.S. District Court for the District of Connecticut, U.S. District Court for the Eastern District of Michigan); (2) there are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction; and (3) I am familiar with the Local Rules of the U.S. District Court for the District of Massachusetts.

Dated: September 15, 2005

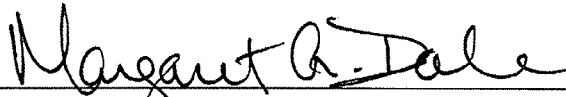


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CERTIFICATION BY MARGARET A. DALE

Pursuant to Local Rule 83.5.3(b), I, Margaret A. Dale, hereby certify that (1) I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice (New York State; U.S. Court of Appeals for the Fourth Circuit, U.S. Court of Appeals for the Eleventh Circuit, U.S. Court of Appeals for the Federal Circuit, U.S. District Court for the Eastern District of New York; U.S. District Court for the Southern District of New York); (2) there are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction; and (3) I am familiar with the Local Rules of the U.S. District Court for the District of Massachusetts.

Dated: September 15, 2005


A handwritten signature in black ink, reading "Margaret A. Dale", written over a horizontal line.

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CERTIFICATION BY DAVID L. SHAUL

Pursuant to Local Rule 83.5.3(b), I, David L. Shaul, hereby certify that (1) I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice (New York State); (2) there are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction; and (3) I am familiar with the Local Rules of the U.S. District Court for the District of Massachusetts.

Dated: September 15, 2005

A handwritten signature in cursive script, reading "David L. Shaul", is written over a horizontal line.

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